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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

A.B.,

Plaintiff,

v.

**DR. JASON CAMPBELL and OREGON
HEALTH & SCIENCE UNIVERSITY,**

Defendants

Case No. 3:21-cv-311-HZ

**DEFENDANT DR. JASON
CAMPBELL'S SECOND
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for defendant Dr. Jason Campbell ("Dr. Campbell") has conferred with counsel for plaintiff A.B. and counsel for Oregon Health & Science University, and the parties do not oppose this motion.

MOTION

Dr. Campbell moves the Court for a 30-day extension of the current deadline to file a responsive pleading to the claims set forth in plaintiff's Complaint (ECF 1) ("Complaint") from the current deadline of April 22, 2021 to May 22, 2021.

The extension is requested because counsel for Dr. Campbell and counsel for plaintiff are in the process of working out a tentative settlement. Dr. Campbell is also addressing the possibility of new counsel substituting for current counsel as a result of insurance coverage if a settlement is not promptly reached. The extension of time would allow sufficient time for settlement discussions and clarification of whether new counsel is required due to insurance coverage.

Defendant's first motion for extension of time to file a responsive pleading was granted on March 15, 2021 extending the deadline from March 23, 2021 to April 22, 2021.

This motion, which is unopposed, is made in good faith and not for the purpose of delay.

Based on the foregoing, Dr. Campbell respectfully requests that the Court grant his motion and issue an order allowing a 30-day extension of the deadline for Dr. Campbell to file a responsive pleading to plaintiff's Complaint, to May 22, 2021.

DATE: April 19, 2021

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